1 JONATHAN O. PENA, ESQ. CA Bar ID No. 278044 2 Peña & Bromberg, PLC 3 2440 Tulare St., Suite 320 Fresno, CA 93721 Telephone: 559-412-5390 Fax: 866-282-6709 5 info@jonathanpena.com 6 Attorney for Plaintiff 7 UNITED STATES DISTRICT COURT 8 EASTERN DISTRICT OF CALIFORNIA 9 10 Case No. 1:22-cv-00377-EPG ELIZABETH MORENO, 11 STIPULATION AND ORDER FOR Plaintiff, EXTENSION OF TIME 12 vs. (ECF No. 13) 13 KILOLO KIJAKAZI, Acting 14 Commissioner of Social Security, 15 Defendant. 16 17 18 19 20 IT IS HEREBY STIPULATED, by and between the parties through their respective 21 counsel of record, with the Court's approval, that Plaintiff shall have a 60-day extension of time, 22 from August 15, 2022 to October 14, 2022, for Plaintiff to serve on defendant with Plaintiff's 23 Motion for Summary Judgment. All other dates in the Court's Scheduling Order shall be 24 extended accordingly. 25 This is Plaintiff's first request for an extension of time. In the months of May through 26 July 21, 2022, Counsel has received an influx of Social Security Certified Administrative 27 Records (CAR) from the Eastern District. A review of the records received shows Counsel has 28 received at least 50 CARs, the majority of which were filed in June 2022.

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1 Additionally, for the weeks of August 15, 2022 and August 22, 2022, Counsel currently 2 has 18 merit briefs, and several letter briefs and reply briefs. Additional time is needed to 3 thoroughly brief this matter for the Court. 4 Defendant does not oppose the requested extension. Counsel apologizes to the Defendant 5 and Court for any inconvenience this may cause. 6 Respectfully submitted, 7 Dated: July 26, 2022 PENA & BROMBERG, ATTORNEYS AT LAW 8 9 By: /s/ Jonathan Omar Pena 10 JONATHAN OMAR PENA Attorneys for Plaintiff 11 12 13 Dated: July 26, 2022 PHILLIP A. TALBERT **United States Attorney** 14 PETER K. THOMPSON 15 Acting Regional Chief Counsel, Region IX Social Security Administration 16 17 By: */s/ Caspar I. Chan 18 Caspar I. Chan Special Assistant United States Attorney 19 Attorneys for Defendant 20 (*As authorized by email on July 26, 2022) 21 22 23 24 25 26 27 28

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ORDER Based on the above stipulation (ECF No. 13), IT IS ORDERED that Plaintiff shall file Plaintiff's motion for summary judgment no later than October 14, 2022. All other deadlines in the Court's scheduling order are extended accordingly. IT IS SO ORDERED. Is/ Encir P. Story
UNITED STATES MAGISTRATE JUDGE Dated: **July 27, 2022**